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W&R Wilson Sonsini Goodrich & Rosati
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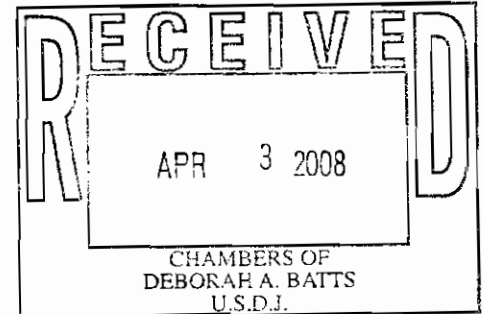
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1301 Avenue of the Americas, 40th Floor
New York, NY 10019-6022
PHONE 212.999.5800
FAX 212.999.5899
www.wsgr.com

April 3, 2008

VIA HAND DELIVERY

The Honorable Deborah A. Batts
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2510
New York, New York 10007



Re: Nokia Corp. v. InterDigital, Inc., et al., Case No. 08-cv-01507 (DAB)

Dear Judge Batts:

We, along with Finnegan, Henderson, Farabow, Garrett & Dunner, LLP ("Finnegan Henderson"), represent InterDigital, Inc., InterDigital Communications, LLC and InterDigital Technology Corp. (collectively, "InterDigital") in the above-captioned case. We write to request that this Court grant a stay of all further proceedings in this action, pending the resolution of the appeal currently before the Court of Appeals for the Federal Circuit. In the alternative, should this Court decide not to grant a stay of proceedings, InterDigital requests that it be granted an extension of time to file its reply in support of InterDigital's pending Cross-Motion to Dismiss.

As the Court is aware, on February 13, 2008, Nokia Corp. ("Nokia") filed a complaint seeking injunctive relief and an order compelling arbitration, or, alternatively, declaratory relief. That same day, Nokia filed its Motion for Preliminary Injunction (the "Motion"), seeking to enjoin InterDigital from proceeding against Nokia before the International Trade Commission ("ITC") and an order compelling arbitration of the claims before the ITC. InterDigital filed its Opposition to the Motion on March 7, 2008 (the "Opposition"). The Opposition also incorporated InterDigital's Cross-Motion to Dismiss Nokia's alternative claim for declaratory relief with prejudice (the "Cross-Motion"). The Court held a hearing on March 20, 2008. At that hearing, your Honor granted the Motion. The Preliminary Injunction and Order Compelling Arbitration (the "Order") was entered on March 26. InterDigital submitted its Notice of Appeal of the Order to the Court of Appeals for the Federal Circuit on March 21. The appeal is currently pending before the Federal Circuit.

The Cross-Motion was not addressed at the hearing and remains pending before this Court. Nokia submitted its opposition to the Cross-Motion on March 28, 2008. In that opposition, Nokia proposed that the Court dismiss the alternative claim without prejudice and sought expressly to reserve Nokia's rights to litigate the alternative claim should the Order

MEMO ENDORSED

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Hon. Deborah A. Batts
April 3, 2008
Page 2

compelling arbitration be reversed on appeal. InterDigital believes that a stay of proceedings is both a more efficient means to temporarily resolve the pending Cross-Motion and a more equitable compromise between InterDigital's motion to dismiss with prejudice and Nokia's proposal to dismiss without prejudice. Counsel for InterDigital at Finnegan Henderson, therefore, contacted counsel for Nokia to request Nokia's consent to a stay of all proceedings in this action, including but not limited to the Cross-Motion, while the appeal is pending in the Federal Circuit. Nokia refused to consent to a stay.

InterDigital believes that a stay of proceedings, rather than dismissal without prejudice, is the more efficient method of proceeding, pending the outcome of the appeal before the Federal Circuit. As with any appeal, there exists the possibility that the Federal Circuit could remand some of the issues or claims to this Court (*i.e.*, for further findings of fact). Should the Federal Circuit remand this case, the basis for that remand may necessitate expedited litigation before your Honor in advance of the upcoming trial before the ITC, currently scheduled to begin on April 21, 2008. In such circumstance, should Nokia wish to have all of its claims adjudicated before your Honor, it would have to go through the procedural steps necessary to amend its Complaint to reassert the alternative claim it now asks to dismiss without prejudice. A stay of proceedings, however, would eliminate the need for Nokia to reassert its dismissed claim, and the litigation before this Court could proceed expeditiously. Moreover, should the Federal Circuit resolve the appeal with no need for further proceedings before this Court, there would be no harm resulting from a stay of proceedings, and the dismissal of the claim for declaratory relief could occur at that time. Further, InterDigital believes that a stay of proceedings is the fairest compromise between the relief InterDigital seeks in the Cross-Motion, dismissal of the alternative claim with prejudice, and Nokia's proposal to dismiss the claim without prejudice.

InterDigital's reply in support of the Cross-Motion is currently due on April 4. InterDigital, therefore, respectfully requests that the Court grant the requested stay, or in the alternative, grant an extension of time for InterDigital to file its reply to April 18, 2008. This is InterDigital's first request for extension of time to file its reply. Counsel for Nokia has communicated to our co-counsel at Finnegan Henderson that it does not consent to this extension due to Nokia's proposal to dismiss the alternative claim without prejudice.

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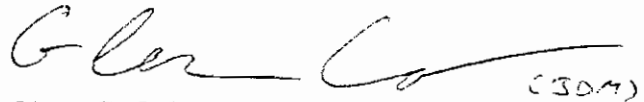
MEMO ENDORSED

Hon. Deborah A. Batts
April 3, 2008
Page 3

Thank you for your consideration of this request.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation



Glenn C. Colton

cc: Matthew D. Richardson, Esq. (via email)
Alan M. Kanzer, Esq. (via email)
Amber C. Wessels, Esq. (via email)
Patrick J. Flinn, Esq. (via email)
Donald R. Dunner, Esq. (via email)
Kara F. Stoll, Esq. (via email)

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*Defendants' request to extend
the time to file its reply to
April 18, 2008 is granted. Defendants'
request to stay the proceedings is denied.
DAB 4/4/2008*

SO ORDERED



DEBORAH A. BATTS 4/4/2008
UNITED STATES DISTRICT JUDGE

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